## STATE OF SOUTH CAROLINA PUBLIC SERVICE COMMISION COLUMBIA

#### **DOCKET NO. 2012-218-E**

In the Matter of	)	
Application of South Carolina Electric & Gas	)	<b>Petition to Intervene</b>
Company for Adjustments in the Company's	)	of Time Warner Cable Inc.
Electric Rate Schedule and Tariffs and Request	)	
For Mid-Period Reduction in Base Rates for Fuel	)	

Pursuant to 26 S.C. Code Ann. Regs 103-825 of the South Carolina Code of Regulations, Time Warner Cable Inc. ("TWC") respectfully requests that the Public Service Commission of South Carolina ("Commission") enter an order permitting it to intervene through its agent, Utility Management Services, Inc. ("UMS"), in the above-captioned proceeding. In support of this Petition, TWC states as follows:

 TWC is a customer of South Carolina Electric & Gas Company ("SCE&G") and has approximately 800 electric accounts within SCE&G's service territory.
 TWC's physical mailing address is:

> Time Warner Cable Inc. 7820 Crescent Executive Drive Charlotte, NC 28217

- In the subject proceeding, SCE&G proposes to change the rates it charges Time Warner Cable Inc., which could financially impact this company. Accordingly, TWC has an interest in this proceeding. Time Warner Cable, Inc has interests that differ from, and are not adequately represented by, other parties to this proceeding.
- 3. TWC seeks relief, through this intervention, in the form of fair and equitable utility rates. This intervention is not for the purpose of delay, and no prejudice will result to the other parties if TWC is allowed to intervene. Time Warner Cable Inc. has certain rights that may be adversely affected if intervention is not

granted at this time. TWC has engaged UMS as its consultant and designated UMS to serve as its agent with regard to procuring electricity within South Carolina.

- 4. TWC is represented in this matter by Mr. Brian W. Coughlan, President of UMS.
- 5. In accordance with Rule R. 103-804 (S) of the Commission Rules of Practices and Procedure, TWC is represented by counsel in this proceeding;

H. Mark Hamlet, Esquire Hamlet and Associates, PLLC 2601 Irongate Drive, Suite 101 Wilmington, NC 28412 mhamlet@hamletandassociates.com SC Bar No: 73924

- 6. TWC intends to submit testimony and present one witness.
- 7. TWC requests the opportunity to receive copies of the pleadings of other participants, receive copies of discovery requests and responses filed by the other participants, and, if appropriate, to submit reply comments and testimony, and briefs, as well as to cross-examine witnesses at any hearing(s) scheduled in this matter. Copies of all communications and correspondence concerning the Petition to Intervene and other matters related to this matter should be directed to:

Brian W. Coughlan, PE Utility Management Services, Inc. 1221 Floral Parkway, Suite 208 Wilmington, NC 28403 BCoughlan@UtilManagement.com

Leslie E. Hudson Utility Management Services, Inc. 1221 Floral Parkway, Suite 208 Wilmington, NC 28403 LHudson@UtilManagement.com Patricia S. Cowart-Coughlan, Esquire Utility Management Services, Inc. 1221 Floral Parkway, Suite 208 Wilmington, NC 28403 PCoughlan@UtilManagement.com

H. Mark Hamlet, Esquire Hamlet and Associates, PLLC 2601 Irongate Drive, Suite 101 Wilmington, NC 28412 mhamlet@hamletandassociates.com

WHEREFORE, TWC respectfully requests that the Commission grant it intervenor status as a full party of record and allow it to participate, through its agent, UMS, fully in these proceedings including without limitation, filing and presenting testimony, cross examination of witnesses, participation in all formal and informal conferences and hearings, and filings of briefs and any other pleading, to the extent it or its agent, UMS, deem necessary for its full participation herein.

Respectfully submitted, this the September, 2012.

H. Mark Hamlet, Esquire

Hamlet and Associates, PLLC

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Wilmington, NC 28412

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SC Bar Number 73924

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## **DOCKET NO. 2012-218-E**

In the Matter of Application of South Carolina Electric & Gas Company for Adjustments in the Company's Electric Rate Schedule and Tariffs and Request For Mid-Period Reduction in Base Rates for Fuel)  Petition to Intervene of Time Warner Cable Inc.
VERIFICATION
Paul Baccellieri, first being duly sworn, deposes and says that he is a Regional Vice President of Fianance for Time Warner Cable Inc.; that he has read the foregoing Petition to Intervene and the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Time Warner Cable Inc.
Paul Baccellieri
Subscribed and sworn to before me this, the Harty of Held-Sims  KAVEN Y. Reid-Sims  Notary Public
My Commission Expires: 4-20-2015
(SEAL)  KAREN Y REID-SIMS Notary Public Mecklenburg County North Carolina My Commission Expires Apr 20, 2015

### **CERTIFICATION OF SERVICE**

I certify that a copy of the Petition to Intervene by Time Warner Cable Inc. in Docket No 2012-218-E has been served by depositing a copy in the United States mail, postage prepaid, addressed to the parties of record.

This, the 5 day of Systemper, 2012.

H. Mark Hamlet, Esquire
Hamlet and Associates, PLLC
2601 Irongate Drive, Suite 101
Wilmington, NC 28412
mhamlet@Hamletandassociates.com
SC Bar Number 73924

#### Service List

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